

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

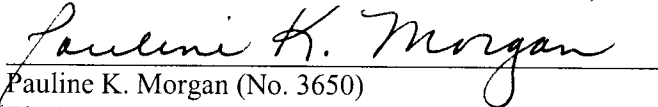
In re: Teleglobe Comm. <i>et al.</i> ,)	Chapter 11
)	Jointly Administered
Debtors.)	
_____)	Bankr. Case No. 02-11518 (MFW)
)	
Teleglobe USA Inc. <i>et al.</i> ,)	
)	
Plaintiff,)	
)	
v.)	Civ. Action No. 04-1266 (SLR)
)	
BCE Inc. <i>et al.</i> ,)	
)	
Defendants.)	

**DEFENDANTS' RESPONSE TO PLAINTIFFS' MOTION
TO APPOINT A SPECIAL DISCOVERY MASTER**

As described in defendants' memorandum filed concurrently herewith, defendants have complied in good faith with their discovery obligations. See Defendants' Memorandum in Opposition to Plaintiffs' Motion to Compel Production of Documents Wrongfully Withheld, filed March 1, 2005 ("Def. Mem."), at pp. 2-22. Defendants consent, however, to the appointment of a special discovery master in this proceeding, pursuant to Federal Rules of Civil Procedure 53(a)(1)(C) and 53(c). The parties are in the process of working out the process and mechanics concerning the appointment of the special discovery master.

Dated: March 1, 2005
Wilmington, Delaware

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CERTIFICATE OF SERVICE

I hereby certify that on **March 1, 2005**, I electronically filed a true and correct copy of **Defendants' Response to Plaintiffs' Motion to Appoint a Special Discovery Master** with the Clerk of the Court using CM/ECF, which will send notification that such filing is available for viewing and downloading to the following counsel of record:

Gregory V. Varallo, Esq. Mark D. Collins, Esq. Robert J. Stern, Jr., Esq. Richards, Layton & Finger, P.A. 920 N. King Street Wilmington, DE 19801	Kevin A. Gross, Esq. Joseph A. Rosenthal, Esq. Rosenthal, Monhait, Gross & Goddess, P.A. 1401 Mellon Bank Center P.O. Box 1070 Wilmington, DE 19899-1070
US Trustee Office of the US Trustee 844 King Street, Suite 2313 Lock Box 35 Wilmington, DE 19801	John P. Amato, Esq. Mark S. Indelicato, Esq. Zachary G. Newman, Esq. Jeffrey L. Schwartz, Esq. Hahn & Hessen LLP 488 Madison Avenue New York, NY 10022

I further certify that on March 1, 2005, I caused a copy of **Defendants' Response to Plaintiffs' Motion to Appoint a Special Discovery Master** to be served by hand-delivery on the following counsel of record:

Gregory V. Varallo, Esq. Mark D. Collins, Esq. Robert J. Stern, Jr., Esq. Richards, Layton & Finger, P.A. 920 N. King Street Wilmington, DE 19801	Kevin A. Gross, Esq. Joseph A. Rosenthal, Esq. Rosenthal, Monhait, Gross & Goddess, P.A. 1401 Mellon Bank Center P.O. Box 1070 Wilmington, DE 19899-1070
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I further certify that on **March 1, 2005**, I served **Defendants' Response to Plaintiffs' Motion to Appoint a Special Discovery Master** of the following non-registered participants in the manner indicated below:

BY FEDERAL EXPRESS:

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